

2.0 THE AQAP IN THE CONTEXT OF OTHER PLANS, POLICIES & STRATEGIES

2.1 BACKGROUND

Air Quality Action Plans should support existing or forthcoming plans, policies and strategies within the City / County and vice versa. The following documents contain either air quality information or ways that we are working to try and reduce pollution, providing additional support to the Action Plan:

- **Hampshire Local Transport Plan 2006 – 2011**
- **Winchester Movement and Access Plan WMAP**
- **Community Strategy**
- **Corporate Strategy 2005 -2008**
- **Winchester District Local Plan**

2.2 HAMPSHIRE LOCAL TRANSPORT PLAN 2006-2011

It is important to recognise that Hampshire County Council, as the local Highway Authority, is responsible for the majority of transport and highway proposals in the Plan area, although the Department for Transport (DfT) is responsible for motorways and trunk roads.

Hampshire County Council, through the Hampshire Local Transport Plan, sets out the Highway Authority's detailed proposals for developing an integrated transport strategy over a five year period. The first Local Transport Plan, covering the period 2001-2006, had 7 objectives:

- to increase accessibility to services
- to promote safety
- to reduce the impact and effect of congestion
- to widen travel choice
- to contribute towards improvements in air quality
- to support wider quality of life objectives
- to encourage value for money and efficient asset management

The local transport plan was put together by the County Council in partnership with City and Parish Councils and other key stakeholders. Action to improve air quality is one of the objectives. Specific initiatives that have had, and are predicted to have a positive impact on air quality include: -

- MIRACLES
- Park & Ride
- School & Workplace Travel Plans
- Improvements to Public Transport Services and Facilities

The second Hampshire Local Transport Plan was published in March 2006. This will cover the period from 2006 to 2011. The Guidance published by the Department for Transport has already made it clear to local authorities responsible for the production

and publication of local transport plans that one of the key issues to be addressed in the next plan period will be Air Quality.

LAQM.PGA(05) provides an updated policy viewpoint for those authorities with AQMAs declared in their areas, for which local road traffic has been identified as the main emission source. Where this is the case, an authority may wish to integrate its action plan into the Local Transport Plan (2006 – 2011).

Air Quality is included within the LTP Second Round (LTP2) as a shared priority – Safety, Congestion and Accessibility forming the other priority areas. Formula funding for the allocation of funds associated with schemes geared toward delivery of these shared priority areas currently favours those local authorities with declared AQMAs (for the Air Quality Shared Priority). Thus, where good integration and alignment of air quality priorities with the LTP2 occurs, additional funding may be allocated. In the case of Winchester City Council, Hampshire County Council is the relevant authority responsible for the delivery of LTP2.

The County Council has already integrated this action plan into the Local Transport Plan for 2006 – 2011. It is intended that future progress reporting on transport measures applicable within this action plan will be undertaken through the annual LTP Progress Report schedule.

An integral part of the LTP process for those authorities with AQMAs within their areas is the setting of targets in line with Mandatory Indicator LTP8. Guidance highlights that:

When setting targets to be achieved within the lifetime of the LTP for improvements in air quality in Air Quality Management Areas (AQMAs) an authority is expected to set realistic, yet stretching, targets for those pollutants that have triggered the declaration of the AQMA (Mandatory Indicator LTP8).

The requirements for Mandatory Indicator LTP8 are:

- *Set a baseline concentration(s) (2004) for those pollutants that have triggered the declaration of the AQMA(s)*
- *Set a target concentration(s) (2010) for those pollutants that have triggered the declaration of the AQMA(s)*
- *Set annual trajectories (intermediate outcomes) for annual assessment of the performance of the LTP. It is strongly recommended that authorities avoid the use of pollutant concentrations for intermediate outcomes due to the influence of meteorology on the dispersal of pollutants, which may lead to elevated levels of pollution, despite progress with reducing emissions within an AQMA.*

Prior to setting any targets for the Winchester City Centre AQMA consideration has been made to what is achievable in realistic terms over the lifetime of the LTP when considered in the wider context of the following:

1. Underlying growth in traffic.
2. Local topography and geography of the area.
3. The existing network infrastructure.
4. Emerging evidence that primary NO₂ levels are increasing (Air Quality Expert Group Report on Nitrogen Dioxide published April 2004)
5. Underlying trend of increasing background ozone levels (more NO_x to NO₂), which means that existing NO_x to NO₂ conversion rates unlikely to hold in future

years ((Air Quality Expert Group Report on Nitrogen Dioxide published April 2004).

Authorities are recommended to use intermediate outcomes to establish the performance of the LTP on an annual basis on air quality, thereby avoiding any influence of meteorological conditions on pollutant concentrations. The use of intermediate outcomes is considered more fully in the LTP.

2.3 WINCHESTER MOVEMENT AND ACCESS PLAN (WMAP)

The Winchester Movement and Access Plan was produced in 1991 and included as part of the Local Transport Plan 2001-2006. However, as part of developing the second Local Transport Plan 2006-2011 WMAP will be superseded by a new strategy or plan for the city. Winchester falls within the Central Hampshire Transport Strategy (CHTS) area. CHTS is one of the four transport strategy areas for Hampshire. It covers parts of the districts of Winchester, East Hampshire, Test Valley and Basingstoke and Deane. The updated transport strategy for Winchester will take forward many of the aims and objectives from WMAP, but revise them to be consistent with the future vision for the city. The aims of the Strategy are to develop a better, more integrated transport system to tackle the problems of traffic congestion and pollution. The Strategy will increase the use of public transport, cycling and walking whilst limiting some of the adverse effects of motor vehicles and maintaining a healthy economy. The measures will increase personal choice by improving travel alternatives for everyone.

The existing WMAP Strategy has been developed through close collaboration between Hampshire County Council and Winchester City Council, and is supported by Central Government.

WMAP Aims

The aims of WMAP have been amended to reflect the ongoing views of key stakeholders and policy initiatives such as the Future of Winchester study within the overall framework of the vision. These aims seek to:

- Reduce the impact of traffic on the environment.
- Reduce traffic accidents and the severity of casualties.
- Reduce air pollution, noise and vibration.
- Reduce the visual intrusion of traffic.

Objectives

The aims set out above have been adopted with the following objectives in mind:

- To provide pleasant pedestrian areas with safe footways and road crossings, paying particular attention to the needs of people with mobility impairments.
- To reduce traffic in the central area by providing Park & Ride services operating from car parks located at strategic sites close to major access corridors on the outskirts of the city.
- To improve the efficiency and attractiveness of public transport by introducing bus priority measures so that buses become a viable and preferred option to the car.
- To reduce traffic speeds, accidents and manage demand through traffic management and environmental improvement schemes which provide a safer and more attractive environment for pedestrians and cyclists.

- To encourage more and safer cycling by providing a comprehensive network of on-road and off-road cycle routes serving the city centre, other key employment sites, schools and colleges.
- To provide better information to travellers through the introduction of intelligent transport systems which assist in managing the network, the management of transport demand and to provide travellers with real time information enabling them to make informed travel choices.

2.4 COMMUNITY STRATEGY

A Community Strategy for Winchester City

“Our vision for the Winchester City is of diverse and dynamic communities, where people work together to ensure that everyone has the opportunity to lead a fulfilling life now and in the future.”

The **Community Strategy** for Winchester City sets out a vision for the City over the next 10 to 15 years. It has been drawn up from extensive consultation with local communities, and with business, cultural, public, voluntary and community sectors. The Strategy sets out how a range of partnerships can work together to help achieve a good quality of life for the people of this City.

The Community Strategy was created by ‘**Winchester and City Working Together...**’, ‘Winchester and City Working Together...’ is a partnership of the major agencies in Winchester City – public, private and voluntary – who are working together to improve the quality of life for those who live, work and visit the area. This is also known as a Local Strategic Partnership. It has been working for two years to produce the Community Strategy that identifies the priority issues facing Winchester City and what the partnership can do to address them. By sharing their aims through this strategy, the partners can direct their resources most effectively to promote the future prosperity of the area.

The Community Strategy aims to achieve better linkages across different organisations and to develop new solutions to problems which matter to the community. Over the next five to ten years, the partnership will be working to deliver the aims set out in the strategy. A series of Action Plans will be developed under each theme and these will be supported by the policies and strategies from each key partner.

The Strategy is split into nine themes which reflect important aspects of people’s lives. With respect to Air Quality the key theme is:-

Transport and Access

Our shared aim

To improve accessibility so that everyone can enjoy a good range of shops, employment and leisure opportunities as well as having easy access to basic services such as health and education, while minimising the adverse environmental impacts of travel.

1. Accessibility is an important issue for everyone in the community as it involves the ability of any individual to participate in a particular activity, including employment, shopping, leisure, education and health. However, accessibility issues are different across the District. In the urban area of Winchester town centre, there are environmental problems caused by traffic congestion, air quality, noise and vibration, while in the rural areas, the car has become essential in order to achieve access to basic services. New technology offers alternative forms of access to some services

but not all people are able to benefit from this, either because of technical or financial constraints or because they lack the desire, skills, equipment, knowledge or confidence to use it.

2. Our aim is to balance the conflicting requirements of improving accessibility for all sections of the community while minimising the adverse impacts that such improvements may have on the quality of life in this District. Any proposed improvements also have to be achievable in terms of cost and be acceptable to the community. They must also take account of the varied needs of individuals, particularly those who have a disability, those who are not fluent in English and those who have difficulty with the written word.

3. Transport and access policies must complement other strategic issues. These include health with the benefits of walking and cycling, education with the transport problems to and from schools, safety with the need to reduce the number of road traffic accidents, and economic prosperity where many large and small businesses are dependant on good transport links.

4. We need to find ways of improving accessibility for all sections of the community, and at the same time ensuring that Winchester is a pleasant and safe place to live, to work and to visit. Providing more road capacity to carry more cars is not an environmentally sustainable solution, although the car will remain the primary form of transport for many, particularly in rural areas. Alternatives to the car will be encouraged for trips to work and school, and for trips within the built up areas of the district. There is also a need to reduce social exclusion by improving both public and community transport.

Present Situation

5. WMAP has been in place since 1991 and several projects have achieved significant improvements in Winchester town centre:

- The introduction and subsequent expansion of Park & Ride at Bar End has removed traffic and reduced congestion in the town centre.
- Major enhancements to High Street and Jewry Street have reduced traffic speeds and created a better environment for pedestrians.
- A major scheme outside Winchester Station has greatly improved bus/rail interchange and provided better access for buses, taxis, pedestrians and cyclists.
- The MIRACLES Quality Bus Partnership has enhanced bus services on routes 1 and 5 through Winchester with new buses, improved frequencies and upgraded stopping places.
- A Controlled Parking Zone has been introduced to discourage commuter parking in residential areas and the City Council has taken over on street parking enforcement.

Future Trends and Pressures

6. Despite the encouragement of more sustainable approaches to transport in recent years, both the level of car ownership and the level of car usage have continued to increase. There have also been increases in the number of rail passenger journeys per year and the level of walking, but the number of bus passenger journeys¹ and the

¹ Contrary to national indicators for the level bus passenger journeys the development of the Winchester QBP (through the MIRACLES initiative) has helped to increase overall bus patronage into the city.

level of cycling have reduced. There have been significant reductions in the number of people killed and injured in road traffic accidents. There has also been some success in encouraging the development of workplace and school travel plans. The transfer of journeys to work and school on to public transport are most important in reducing traffic congestion and achieving environmental benefits.

7. In general while the community often accepts the principles of sustainable transport, individuals find it difficult to change their travel habits and are reluctant to give up the flexibility, convenience and comfort of their cars. We recognise that there is scope for improving both bus and community transport services but will need to find ways that this can be done at a cost acceptable to the community. We also acknowledge that there is often local pressure to provide more bus and rail services in the evenings and on Sundays in order to improve accessibility to leisure activities.

8. The growth in electronic communications is likely to continue as the distinction between phones, computers and televisions becomes increasingly blurred, people become more comfortable with the technology and more used to being able to access many services at whatever time is convenient to them. This will have an impact on traditional working practices and may see a move away from the need for a 'shop front' in some sectors of the economy. Use of electronic systems within organisations can allow a stronger focus on specialist customer centres, with the potential for more joined up working between different public organisations.

Medium Term Improvements

9. We will take the following steps to help us realise our long term vision. Action on these will be the overseen by a transportation consortium formed from representatives of various transportation liaison groups that currently operate within the District.

Key Indicators

- Measures of air quality in Winchester Town Centre (from road side monitoring equipment)
- Annual average traffic flow on selected roads in the city (from measurements made by Hampshire County Council and ONS)
- Percentage of residents using different types of transport (from residents' survey)
- Percentage of children travelling to school by different types of transport (from residents' survey or survey of schools)
- Number of community transport/dial a ride
- Use of rural transport services and number of bus and train passengers on Winchester services

Links to Existing Strategies

The following strategies set out more detailed actions to address issues raised in this chapter:

- Hampshire Local Transport Plan
- Winchester District Local Plan 1998 and Winchester District Local Plan Review (Revised Deposit 2003)

| Improvement | Lead Partner | Contributes to following aims: | | | | | | | | |
|---|--------------|--------------------------------|--------|-------------------|--------------------|---------------------|--------------------------|-------------------|----------------------|-------------------|
| | | Housing | Health | Freedom from Fear | Transport & Access | Economic Prosperity | High Quality Environment | Lifelong Learning | Leisure & Recreation | Inclusive Society |
| TA1. Establish Park and Ride on all principal routes into Winchester. | HCC | | | | ✓ | ✓ | ✓ | | | |
| TA2. Consider means to improve accessibility to Winchester Railway Station. | HCC | | | | ✓ | ✓ | | | | |
| TA3. Extend Park & Ride buses to the Hospital. | WCC | | | | ✓ | ✓ | ✓ | | | |
| TA4. Improve air quality in Winchester town centre by reducing levels of congestion. | HCC | | ✓ | | | | ✓ | | | |
| TA5. New high quality bus station as part of the Friarsgate redevelopment. | WCC | | | | ✓ | ✓ | ✓ | | | |
| TA6. Provide safer and more convenient walking and cycling routes. | HCC | | ✓ | | ✓ | | ✓ | | | |
| TA7. Reduce social exclusion by improving public and community transport, including addressing rural issues. | HCC | | | | ✓ | | | | | ✓ |
| TA8. Reduce vehicle emissions particularly from buses and advocate alternative fuel systems. | Bus | | ✓ | | | | ✓ | | | |
| TA9. Support the production of workplace and school travel plans. | WCC | | | | ✓ | ✓ | ✓ | | | ✓ |
| TA10. Enhance rural life through sustainable access initiatives. | HCC | | | | ✓ | | | | | ✓ |
| TA11. Encourage the provision of rural demand responsive bus services. | HCC | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| TA12. Ensure new developments encourage use of sustainable transport options. | WCC | | | | ✓ | | ✓ | | | |
| TA13. Encourage greater public participation in the transport debate. | WCC | | | | ✓ | | | | | ✓ |
| TA14. Develop local access points throughout the District. | WCC & PCs | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| TA15. Ensure that people with disabilities are able to access services. | WAC | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

Bus – Bus Companies
 HCC – Hampshire County Council
 PCs – Parish Councils
 WAC – Winchester Area Community Action
 WCC – Winchester City Council

2.5 CORPORATE STRATEGY - 2005-2008

THE COUNCIL'S AIM AND VALUES

The Community Strategy for this District, developed through the Winchester Local Strategic Partnership, sets out a vision for improving quality of life across the District over the next ten years. As our contribution to delivering this vision, Winchester City Council:

... wants people to be able to live, work and enjoy life in the District with a real sense of belonging. We will provide leadership for the area and we will work with partners to ensure that services are provided in ways that best meet the needs of the residents, now and in the future.

The City Council recognises that the way we work and our values as an organisation determine the quality of services we provide. The Council strives to be an organisation which:

- makes our residents top priority
- is guided by strong political leadership
- is financially prudent
- communicates openly and honestly
- constantly improves by learning from others and seeking creative and innovative ways of working
- delivers in partnership
- values diversity and equality of opportunity for all
- acts in a sustainable way and encourages others to do likewise

In delivering the priorities set out in this Strategy, the Council will act according to these values.

BETTER SERVICE

Taking account of the Community Strategy and the vision set by the Council and having considered the current circumstances of the District and the views of citizens, the Council has identified the following as the key service areas on which we will focus over the period of the Corporate Strategy:

1. Homes

To address the longer term aim of providing decent affordable homes for all sectors of our community, over the period of this Strategy we will:

- respond to the housing needs of the District by facilitating the delivery of new housing in the light of Government targets;
- work with Parishes and other public sector bodies to identify suitable sites, including exception sites, for affordable rural housing;
- work with the Housing Forum to address the housing needs of vulnerable elderly people (informed by the Supporting People review of Sheltered Housing) and of the student population;
- by 2010, meet the outcomes dictated by the Housing Options Appraisal so far as the Decent Homes Standard for Council housing is concerned.

2. **Community Safety**

To create communities that feel safe and further reduce levels of crime and anti-social behaviour in the District, over the period of this Strategy, we will:

- be a vigorous and challenging member of the Community Safety Partnership and fulfil our obligations under the new Community Safety Strategy;
- work with the police and other partners to reduce the incidence of anti-social behaviour;
- provide a neighbourhood warden scheme in Stanmore and Highcliffe and consider extending this as resources allow;
- review the contribution that CCTV is making to community safety and consider the future role of CCTV.

3. **Green Agenda**

To minimise pollution and waste and to make efficient use of resources, over the period of this Strategy we will:

- significantly reduce landfill, encourage increased re-use and promote recycling;
- **promote more sustainable transport in order to reduce congestion and improve air quality, including implementation of the Air Quality Action Plan in partnership with Hampshire County Council;**
- increase the number of routes into Winchester where Park & Ride is available and press Hampshire County Council to develop a second Park & Ride site urgently;
- work with partners to increase local communities' pride in the place where they live;
- work with Hampshire County Council to improve the condition and safety of roads and pavements.

4. **Social Inclusion**

To ensure that everyone can play a full part in the life of their community, over the period of this Strategy we will

- work towards the aims set out in the Council's Social Inclusion Strategy
- review the contribution that services provided by our partners are making towards the joint aims agreed in the Community Strategy, Community Safety Strategy and Social Inclusion Strategy.
- take our services and those of other agencies to all our communities.

5. **Economic Prosperity**

To achieve a strong and diverse urban and rural economy which builds on local strengths and offers opportunities for all, over the period of this Strategy we will:

- create opportunities for start up businesses working with local universities and colleges;
- recognise, support and develop local businesses in Winchester, the market towns and the rural areas of the District.
- revitalise the commercial areas of Winchester, including Winnall Industrial Estate and the Friarsgate/Broadway area ("*Silverhill development*");
- develop a vision for the evening economy;
- increase the contribution made to the local economy by a well organised and sustainable range of creative and cultural events and activities.

6. **Cultural and Leisure Opportunities**

To increase access to cultural and sporting activities, over the period of this Strategy, we will:

- encourage healthy lifestyles by promoting use of local facilities and working in partnership with local Primary Care Trusts;
- promote Winchester and District as a centre for culture, education, conferences and tourism;
- develop new ways to provide better public access to heritage services, where possible in partnership with Hampshire County Council and other local organisations;
- invest in projects and partnerships which will provide for the leisure, sporting and cultural interests of young people.

WORKING BETTER

To deliver services efficiently and effectively, the Council must be well managed. In seeking to improve management, we also seek to work according to our agreed values. The Council has identified the following as its key areas in which we will improve corporate management over the period of the Corporate Strategy:

7. **Aims & Priorities**

We will have in place a robust planning framework to link the vision set out in the Community Strategy and priorities set out in this Corporate Strategy with day-to-day targets and objectives. Over the period of this Strategy we will:

- work with partners on the Local Strategic Partnership to ensure the Community Strategy is regularly reviewed and progress towards the improvements it identifies monitored;
- review the Corporate Strategy annually to ensure it identifies priorities which meet the District's needs;
- develop and maintain a Performance Plan and Departmental Business Plans which provide a basis for identifying improvements to implement this Corporate Strategy and monitor its delivery;
- develop and implement a medium term (3-year) Service and Resource Plan.

8. **Performance Management**

We will have in place a robust system for setting targets, monitoring progress against those targets and guiding corrective action where necessary. Over the period of this Strategy we will:

- report the Council's progress in delivering the Corporate Strategy and Business Plan targets on a quarterly basis;
- drive continuous service improvement by undertaking an annual programme of reviews, as agreed with Cabinet and Principal Scrutiny Committee;
- continue to demonstrate high standards in managing the taxpayers' money - being open to scrutiny, providing services that are efficient and at reasonable cost, avoiding profligacy, maintaining sensible levels of reserves and planning ahead.

9. **Council Structures and Procedures**

We will have efficient structures and procedures to provide political leadership to the Council and District. We will have effective organisational arrangements and management to deliver continuous service improvement. Over the period of this Strategy we will:

- review annually decision-making structures and procedures to ensure they remain efficient, open and accountable;
- review the Council's arrangements for scrutiny of the Executive to hold Cabinet to account and contribute constructively to policy and service development;
- maintain an overview of staff levels and management to ensure they can deliver the Council's priorities effectively.

10. **How We Work**

We will follow work practices which are consistent with our corporate values. Over the period of this Strategy we will:

- improve arrangements for communicating the Council's aims, objectives, policies and performance to Members, staff and the wider community;
- make customer service the key to all we do by seeking to provide services which reflect the needs of our citizens, by improving access to our services and by improving the timeliness and accuracy of advice and information we provide;
- improve working across departments and with external partners to provide joined-up and efficient services;
- ensure our staff are well trained and properly resourced to provide excellent services.

11. **Corporate Policy Framework**

The Council has developed a number of key policies which guide its effective management. Over the period of this Strategy we will keep these under review and implement improvements identified in the:

- Corporate Programme for making Council buildings and services more accessible;
- Communications Strategy;
- Environment Strategy;
- Financial Strategy;
- Policies and programmes for enhancing electronic access to services
- Procurement Strategy;
- Corporate protocol for project management;
- Risk Management Strategy;
- Sustainability Strategy;
- Corporate policy for the protection of vulnerable children and young people.

2.6 WINCHESTER DISTRICT LOCAL PLAN

Planning decisions can have a significant, longer term impact on travel behavior and levels. The Council, through its function as a planning authority, can influence new development to ensure that it is designed and located so as to reduce the need to travel. It may also provide a range of attractive and convenient travel choices, encouraging alternatives to car use, in accordance with national planning policy.

Land use proposals in the Local Plan complement and are fully integrated with the Local Transport Plan's objectives. In particular, they promote sustainable development that minimises the demand for travel, particularly by car, and promote the use of walking, cycling and public transport.

The Adopted (1998) Local Plan and its implications on Air Quality

The integration of land use, transport and highways is key to the Council facilitating delivery of sustainability. Our Local Plan adopted 1998 sets a number of guiding policies.

Proposal EN.14 Planning permission for development which potentially generates air, land or water pollution, and which accords with other relevant proposals of this Plan, will normally only be permitted provided the Local Planning Authority is satisfied that it has been designed to reduce its impact to an acceptable level. Proposals will normally need to comply with the statutory standards of environmental quality required by the pollution control authorities, and to include a statement setting out how the requirements have been met in designing the proposal.

Proposal EN.16 Planning permission for new development which accords with other relevant proposals of this Plan will normally only be permitted provided the Local Planning Authority is satisfied that it achieves an acceptable standard of environmental quality and minimises levels of pollution affecting the development, both within buildings and in spaces around them.

The District Local Plan Review

The Local Plan Review will replace the adopted District Local Plan, when adopted (adoption expecting in 2006). A Revised Deposit version of the Local Plan Review was published in May 2003. A Public Local Inquiry was held from June 2004 to March 2005 and the Inspector's Report was published in September 2005. Proposed modifications to the Local Plan following the public inquiry were published in January 2006. The Revised Deposit Plan contains the following specific section on pollution:

Specific Design and Development Principles

3.50 This section details Design and Development Principles for:

- pollution-generating development;
- unneighbourly uses;
- pollution-sensitive development;
- development on contaminated land;
- public utility development;
- renewable energy schemes.

Pollution generating development

3.51 When formulating development proposals, early consideration should be given to the potential for pollution from a proposed use. Guidance should be sought from the appropriate pollution control authorities on the standards of environmental quality required and features that need to be incorporated in the design process. Where possible, proposals should strive to exceed statutory standards and show how they contribute to sustainable development.

3.52 For advice on acceptable noise levels, standards of air quality, and other measures to avoid adverse environmental effects or nuisance, developers should consult the City Council's Environmental Health Department. For proposed uses listed in Part A of the Environmental Protection (Prescribed Processes and Substances) Regulations 1991, applicants will need to consult the Environment Agency. Developers also should consult the Environment Agency for advice on standards of water quality (see also Proposal DP.9), waste disposal and contaminated land.

3.53 All planning applications for development with potential to cause pollution should include a statement setting out how the proposed location and design minimises the problem, and how the effects are to be mitigated.

Proposal DP.13

Development which may generate air, land, light or surface water or groundwater pollution, and which accords with other relevant proposals of this Plan, will only be permitted where the Local Planning Authority is satisfied that it has been designed to reduce the impact to an acceptable level. Proposals should comply with the statutory standards of environmental quality and environmental protection policies required by the pollution control authorities, and include a statement setting out how the requirements have been met in designing the proposal.

3.54 Developers who are in doubt as to whether their proposals are likely to cause pollution should contact the Environmental Health Department of the City Council before submitting a planning application.